

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

| | | |
|---------------------------|---|-----------------------|
| IN RE: | * | |
| | * | CASE NO. 14-00792 BKT |
| MARIA IVETTE ORTIZ RIVERA | * | |
| | * | CHAPTER 13 |
| DEBTOR | * | |

**APPLICATION FOR ALLOWANCE OF COMPENSATION FOR
SPECIAL COUNSEL FOR THE DEBTOR**

TO THE HONORABLE COURT:

NOW COMES, **MARIA IVETTE ORTIZ RIVERA**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states, prays and requests as follows:

1. On February 5, 2014, the debtor filed a *Voluntary Petition* for relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§ 1301, et seq.
2. The debtor, as part of the bankruptcy estate assets, listed a cause of action against MAPFRE/Praico Insurance Company, consisting of a tort action.
3. On April 29, 2014, the debtor filed an application to employ Carlos J Correa Ramos, Esq., as Counsel for debtor to represent the debtor in the aforementioned cause of action, and the same was granted by this Honorable Court, docket entry numbers 17 and 21.
4. In this civil case number HSCI201200561, *Maria I Ortiz Rivera, et al. v. MAPFRE/Praico Insurance Company*, the parties reached an agreement for the sum of \$15,000.00.

Page -2-
Debtors' Motion Requesting Order
Case 14-00792 BKT13

5. A summary of the fees requested, and for which this application is filed, is as follows:

| | |
|---------------------------------|-----------------|
| AGREEMENT AMOUNT..... | \$15,000 |
| SPECIAL COUNSEL RATE..... | 33% |
| ATTORNEYS FEES AT 33%..... | \$ 4,950 |
| TOTAL COMPENSATION | \$ 4,950 |

6. Attached is Special Counsel's Application for compensation, duly signed by Carlos J Correa Ramos, Esq., wherein Special Counsel states that he is a disinterested person in the above captioned case and is not involved in any other aspect of the debtor's bankruptcy petition.

WHEREFORE, the debtor respectfully requests this Honorable Court grant the present motion and enter an Order allowing the requested compensation of \$4,950.00 for professional services rendered in this case from the funds of the estate.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law;

Page -3-
Debtors' Motion Requesting Order
Case 14-00792 BKT13

(ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to: the US Trustee's Office, Monsita Lecaroz Arribas, Esq., Assistant US Trustee; to the Chapter 13 Trustee Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to debtor Maria Ivette Ortiz Rivera, PO Box 1206 Yabucoa PR 00767; and to all creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 16th day of October, 2014.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
ATTORNEY FOR PETITIONER
USDC #203614
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 746-5294
Email: rfigueroa@rfclawpr.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MARIA IVETTE ORTIZ RIVERA
Debtor(s)

CASE NO. 14-00792(BKT)

CHAPTER 13

APPLICATION FOR ALLOWANCE OF COMPENSATION

TO THE HONORABLE COURT:

The undersigned, Special Counsel respectfully submits this application for compensation pursuant to 11 U.S.C. 331, as follows:

1. That the above case is a case under Chapter 13 of the Bankruptcy Code.
2. That upon application filed with this Honorable Court by the debtor in this case, your applicant was authorized to act as counsel in order to represent the debtor on a civil case for damages filed at the Humacao First Instance Court.
3. All professional services for which allowance for compensation are hereby applied for were performed by your applicant for the benefit of the estate. These services were related to the legal representation of the debtor to recover compensation for damages in the sum of \$15,000.00.
4. The fees in this application for compensation are the ones stated in the application for appointment of this Attorney as Counsel for the Debtor. Such fees are consistent with prevailing fees in the community for legal services.
5. Enclosed herein is a detailed Invoice describing the services performed.

-2-

6. Parties in interest are hereby advised that the detailed Invoice referred to above has been filed with the office of the Clerk of the Court together with this application where they may be examined during the business hours of said office.

7. There are no agreements on the part of your applicant for the sharing of any of the compensation applied for with any other person.

WHEREFORE, based on the foregoing, it is respectfully requested that this Honorable Court enters an Order allowing the compensation applied for in the amount of \$4,950.00 or a 33% of the monthly compensation for damages paid to the debtor in the above describe civil case.

UNSWORN DECLARATION UPON PENALTY OF PERJURY

The undersigned certifies under penalty of perjury that I have read the foregoing application by me subscribed, and that the facts set forth therein are true to the best of my knowledge and belief.


/s/ **Carlos J. Correa Ramos**
Carlos J. Correa Ramos

NOTICE TO ALL PARTIES IN INTEREST

YOU ARE HEREBY NOTIFIED, that unless a creditor and/or any party in interest files an opposition to this motion within **TWENTY ONE (21) DAYS of the date hereof**, the **Honorable Court may grant the same without the need of a further hearing.**

-3-

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on this same date a copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to Debtor's attorney, to the Chapter 13 Trustee, to the office of the U.S. Trustee and to all CM/ECF participants; as well to all other parties in the master address list via first class mail, postage prepaid.

Respectfully Submitted.

In San Juan, Puerto Rico, this 3 day of October, 2014.


/s/ Carlos J. Correa Ramos
Carlos J. Correa Ramos
RUA #4593
PO Box 546
NAGUABO PR 00718
TEL/FAX: (787)874-2487
EMAIL: cjcorrea@prtc.net

ESTADO LIBRE ASOCIADO DE PUERTO RICO
TRIBUNAL GENERAL DE JUSTICIA
TRIBUNAL DE PRIMERA INSTANCIA
SALA SUPERIOR DE HUMACAO

| | | |
|-------------------------------|---|--------------------------|
| MARIA I. ORTIZ RIVERA Y OTROS | * | CIVIL NUM: HSCI201200561 |
| Demandante | * | |
| | * | |
| v. | * | Sobre: |
| | * | |
| MAPFRE/PRAICO INSURANCE | * | DAÑOS Y PERJUICIOS |
| COMPANY Y OTROS | * | |
| Demandados | * | |
| | * | |

INVOICE

- | | | |
|-----|--|-----------------------|
| 1. | Assumed legal representation of Plaintiff Maria I. Ortiz Rivera | 04/02/2013 |
| 2. | Meeting with client to answer interrogatories and providing answers to Defendants | 02/2013 |
| 3. | File interrogatories to Defendants | 03/25/2013 |
| 4. | Preparation and filing of Initial Report | 03/2013 |
| 5. | Monitor Dr. Ivette M. Ríos Mejía for Expert Witness Medical Report | 05/2014 |
| 6. | Meeting with and preparation of report by Expert Witness, Eng. Gil R. Nieves | 09/2013 |
| 7. | Taking of deposition to Plaintiff | 10/21/2013 |
| 8. | Negotiations with Defendants to settle the case | 03/2014 |
| 9. | Settlement with Defendants | 05/26/2014 |
| 10. | Hearings in Court | 02/2013 to 08/11/2014 |

At Naguabo, Puerto Rico this 27th day of August, 2014.


CARLOS J. CORREA RAMOS
Abogado del María I. Ortiz Rivera
RUA 4593
PO Box 546
Naguabo, Puerto Rico 00718-0546
Teléfono y fax: 787-874-2487
Correo electrónico: cjcorrea@prtc.net

Label Matrix for local noticing
0104-3
Case 14-00792-BKT13
District of Puerto Rico
Old San Juan
Mon Oct 6 09:08:49 AST 2014

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

Asociacion De Empleados De Gobierno
PO Box 70199
San Juan, PR 00936-8199

Asociacion de Empleados de Ela
PO Box 364508
San Juan, PR 00936-4508

BANCO POPULAR DE PR
Prestamo Hipotecario
PO Box 362708
San Juan, PR 00936-2708

Chld/cbna
PO Box 6497
Sioux Falls, SD 57117-6497

Coop A/C Yabucoena y/o Yabucoop
Sistema De Retiro
PO Box 1
Yabucoa, PR 00767-0001

DTOP
PO Box 41269 MINILLAS STATION
SAN JUAN, PR 00940-1269

Fondo Coop
Minillas Sta PO BOX 42006
San Juan, PR 00940-2006

GE Capital Retail Bank
c/o Recovery Management Systems Corp
25 SE 2nd Ave Suite 1120
Miami FL 33131-1605

Gecrb/JC Penney PR
PO Box 965007
Orlando, FL 32896-5007

Gladymir Lopez Rodriguez
HC 04 Box 4088
Humacao, PR 00791-8907

(p)CITIBANK
PO BOX 790034
ST LOUIS MO 63179-0034

Radio/cbna
PO Box 6497
Sioux Falls, SD 57117-6497

Sears Credit Cards
PO Box 183081
Columbus, OH 43218-3081

Sears/Cbna
PO Box 6283
Sioux Falls, SD 57117-6283

Sistema De Retiro
PO Box 42003
San Juan, PR 00940-2203

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MARIA IVETTE ORTIZ RIVERA
PO BOX 1206
YABUCOA, PR 00767-1206

MONSITA LECARAZ ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Radio Shack
PO Box 183015
Columbus, OH 43218-3015

(d)The Children's Place Plan
PO Box 183015
Columbus, OH 43218-3015